NIAGARA COUNTY

HEALTH DEPARTMENT
HUMAN RESOURCES BUILDING
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DIRECTOR'S OFFICE DIRECTOR'S OFFICE

November 26, 1985

Mr. Steven Luftig, P.E.
Deputy Director
United States Environmental Protection Agency
Emergency and Remedial Response Division
26 Federal Plaza
New York, NY 10278

Dear Mr. Luftig:

This department has received and reviewed a copy of "Presentation of Analytical Data from Great Lakes Carbon Corporation, Niagara Falls, NY", which was prepared by NUS for EPA. We have the following comments on this report:

1. It is noted that the fill area is largely uncovered and unpaved. It is also noted that elevated contaminant levels are noted in shallow samples of the fill material. Since this area is used by plant personnel as a material and product storage area, there appears to be a potential for exposure of workers to contaminants present here. It is our recommendation that a copy of the report be transmitted to the New York State Department of Labor so that they can determine whether or not any OSHA or other workplace related standards have been exceeded.

2. It is noted that elevated PNA concentrations were found in samples NY99-SED2, NY99-53 and NY99-54. These samples were taken off the actual disposal area. Since the concentrations of the various PNA parameters are roughly proportionate to the concentrations found in samples from the fill area (NY99-51), there appears to be strong evidence that these contaminants have migrated from the disposal area. It is also noted that samples taken at the "Basic Carbon Site", which is on adjacent property, show a similar "fingerprint" of contaminants. Since the history of the Basic Carbon Site is only vaguely known, it cannot be deduced whether or not these contaminants represent deposition of similar wastes at the Basic Carbon Site or migration from the Great Lakes Carbon Site.

3. Based on the available data, it is not possible to conclude what mechanism is responsible for the contaminants found in samples S2, S3, S4 and Sed 2 being transported to these locations (assuming that migration has in fact occurred). The possible mechanisms could include transport of sediment particles via surface runoff, migration of contaminants via groundwater or direct deposition of wastes at these locations. Of these, the transport of sediment from the site to the sample locations by surface runoff or erosion seems most likely.

4. It is noted that contamination was found (in sediment) at the inlet to the 60th Street storm sewer. It is noted that this sewer discharges directly to the Niagara River above the Niagara Falls Municipal water intakes. Further investigation of the possible implications of these contaminants should be considered.

5. It is noted that barium was detected in both the surface water samples in the "small creek" as well as in one of two sediment samples in this creek. It is noted that this creek contains runoff from the CECOS and Necco Park properties. It is noted that barium is known to be present at Necco Park. It is also noted that while the high pH typically present in the CECOS/Necco Park runoff tends to minimize the soluability of most metals and therefore make it unlikely that they would appear in this runoff, barium generally remains soluable under such conditions. We recommend that the possibility of contaminants migrating from the CECOS/Necco Park area via this route be further explored. The work currently being done for DuPont by Woodward-Clyde Consultants may be of some use here.

6. Since public access to the disposal area is controlled and since groundwater is not locally used as a drinking water supply, it appears that if a route of public exposure is present, it would be via airborne particulates. The possibility of minimizing potential dusting (via covering, use of a palliative, etc.) should be explored.

7. The Great Lakes Carbon Company should be given a copy of the report if they have not already been provided a copy.

8. This department believes that sufficient justification exists to proceed with the installation of the Phase II well cluster located north of the Great Lakes Carbon site as shown on Figure 3-1 of "Work Plan for Investigation of Potential Point Sources of Groundwater Contamination in Niagara Falls, NY".

We will be happy to elaborate on any of the above points or to answer any questions at (716) 284-3128.

Sincerely,

Michael E. Hopkins
Ass't. Public Health Engineer

MEH:cs

cc: Mr. P. Buechi
Mr. J. Anderson
Ms. L. Rusin
Mr. R. Tramantano